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12 *Attorneys for Plaintiffs Arlene Bettencourt
and Harry Harrison*

UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

19 HAZEL WALSH,
20 Plaintiff,
21 v.
22 KINDRED HEALTHCARE, INC., et al.,
23 Defendants

Case No. 3:11-cv-00050-JSW

**STIPULATION AND [PROPOSED]
ORDER TO CONTINUE STAY OF
ACTION PERMIT PARTIES TO
ATTEND MEDIATION UNTIL
JANUARY 31, 2013**

The Honorable Jeffrey S. White

WHEREAS the parties agreed to and the Court ordered a 90-day stay of this action until December 20, 2012, to allow the parties to attempt to explore a resolution of this matter;

WHEREAS the parties have conducted two all-day mediation sessions with Judge William Cahill (Ret.) on December 7 and 13, 2012 and have a third session scheduled on January 10, 2013;

WHEREAS the parties do not want to expend resources in connection with discovery and other litigation issues while they are continuing to engage in the mediation process;

WHEREAS the parties believe that an additional stay of the litigation until January 31, 2013 will allow them to engage in a mediation process in an attempt to explore resolution of this matter;

NOW THEREFORE, it is stipulated that:

1. The stay of the litigation will continue until January 31, 2013;
 2. The parties will advise the Court of their progress ~~after January 31, 2013~~ by February 6, 2013.

Dated: December 28, 2012
Respectfully submitted,

MANATT, PHELPS & PHILLIPS

By: /s/ Brad W. Seiling
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1 Dated: December 28, 2012

Respectfully submitted,

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3 By: /s/ Kathryn Ann Stebner

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12 Dated: December 28, 2012

Respectfully submitted,

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HARRY HARRISON

5 **Filer's Attestation:** Pursuant to General Order No. 45, Section X(B) regarding signatures, Brad
6 W. Seiling hereby attests that concurrence in the filing of this document has been obtained.
7

8 PURSUANT TO STIPULATION, ~~IT IS SO ORDERED.~~ AS MODIFIED ABOVE, IT IS
9 SO ORDERED.

10 Dated: January 2, 2013


The Honorable Jeffrey S. White

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